

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF WISCONSIN

ESTATE OF TERRY WILLIAMS,
By Special Administrator CUC HUYNH
L.W., DAUGHTER OF TERRY WILLIAMS,
By LAQESHA GREEN and CUC HUYNH,

Plaintiffs,

v.

Case No.: 18-CV-1222

MICHAEL TRUAX, Deputy for the Milwaukee
Sheriff's Department, JOHN DOE #1 and
other unnamed members of the Milwaukee
County Sheriff's Dept.,

Defendants.

STIPULATION FOR PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26(c) and Civil L.R. 26(e), the parties, by their
undersigned counsel, hereby agree and stipulate as follows:

(A) Due to the subject matter, claims, and defenses, in the above-captioned
action, the parties in good faith anticipate that nonpublic confidential law
enforcement, medical, financial, personal, employment, and other sensitive
information will be exchanged in discovery in this matter;

(B) The parties in good faith believe that the exchange of information
between or among the parties and/or third parties other than in accordance with the

attached proposed protective order may cause unnecessary damage and injury to the parties or to others;

(C) To facilitate open and efficient discovery and the exchange of such confidential information, the parties stipulate to and request that the Court enter the Protective Order attached hereto as Exhibit A.

Dated this 27th day of March, 2019.

By: /s/ Benjamin A. Sparks
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Dated this 27th day of March, 2019.

By: /s/ Walter W. Stern III
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